

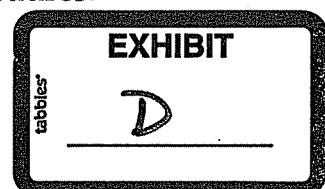
**AFFIDAVIT  
OF  
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I started working at Lexington in 1990. I started as a press operator and then a couple months later I worked in the quality department and that's where I stayed until I quit. I started in the quality department as a quality technician where I worked auditing parts on the floor. Some of the other duties I had at Lexington other than auditing on the floor: I started getting involved in different meetings, I was on the containment team. I was on the critical parts team, QS9000 and later on I got onto a cure time reduction team, I became a supervisor and then I oversaw other auditors on the floor and I got more involved in working closer with the quality manager which involved more administrative duties and I also worked with customer complaints.

I supervised twelve people; auditors on all three shifts. What it came down to was I actually managed the quality on the floor. I managed people, I managed systems, I managed procedures and I did this up until January of 2000 when I quit.

I got another job because I wasn't happy at Lexington because I felt the business was going down hill. In the early years of my working in the quality department quality was truly the voice of the customer. I mean we were there to protect the customer and we were protecting the customer in the beginning. If we had a problem or if we were running scrap we had the authority to shut the tool down. We had control on the floor as to what they were running and making sure that the product met the customer's specifications. We had a good direct ship program for awhile where we were shipping product directly from the floor into shipping. We had a 97% acceptance rate at that time. We had good product sitting in shipping waiting to be shipped.

Then when Keith Blockinger became President things started to change. First it was gradual and then it just started going down hill pretty fast, but Keith Blockinger eventually started taking more and more control away from the quality department and he started dictating more and more how he wanted to see things run. He would undermine the quality department. If we had a program that we were trying to put together or, procedures that we wanted to implement in the plant he would undermine those programs and procedures.



I want to talk about some of the ways Keith Blockinger undermined the quality department. If the quality technicians or myself would make quality calls on the floor, he would go to production or engineering and undermine what we were saying. He'd make comments like "f\*\*\* them you don't have to listen to them," "who do they think they are?" "you're going to run don't listen to them," he would make comments to me like "well we're shipping it" or "no, you can't do that because we have to get this product out, ship it Debbie."

Eventually it got to the point where he wouldn't let us shut a press down to correct it, if it was running scrap. So we lost control over that. These things were main job functions of all quality personnel that he was systematically undermining and taking away.

Another time that the quality department was undermined by Keith Blockinger was when we tried to introduce a procedure into a 100% inspection department. We asked them to inspect some product for us. The inspection supervisor, Rosalee Ramsey, at the time, went and complained a little bit to Keith Blockinger that she didn't have time to provide that time of inspection data and Keith Blockinger's comment to Rosalee Ramsey at that time was "you tell them to get off their fat asses and do it." "Your not doing it." "Stop now." That was a very critical mission that not just the quality department but Lexington as a company were trying to complete and resolve a problem for a large customer at the time. The customer was AMP and we needed to gather information. We were not allowed to do so per Keith Blockinger.

Other times the reason that information out of 100% inspection was so critical is that it was mandated by the customer that we resolve the defects that we were producing and shipping to them.

When you are in the automotive industry there are certain customer requirements that must be met when you ship defective into their plant. Gathering information through a formal problem solving program is one of those requirements. Keith Blockinger was not interested in resolving the problem. He could care less about us going through proper automotive customer requirements to resolve those problems because we were expected to falsify the data, continue to pump defective product out of the presses and through a hope and a prayer, 100% inspection would sit there and pick them out and in the meantime to meet customer requirement we would falsify the data as though we gathered data, analyzed the data, interpreted properly, applied corrective action and are now running defect free and lying to the customer that

they now have defect free product coming into their plant. That they can now sleep easy that the problem has been resolved and they will no longer receive defective product in their plant. That was never the case, not ever was that the case because we were never allowed to follow mandated automotive customer requirements because they were considered time consuming, they were considered to involve heavy resources in personnel and particularly in money because many, many times Keith Blockinger knew what the problems were.

Keith Blockinger knew why we were shipping defective. We were shipping defective because we were required to qualify and pass bad tooling. We were required to qualify and pass in some cases, not all cases, but in some cases, defective raw material and Keith knew very well what those problems were. It would take alot of money and it would take alot of time and it would take alot of personnel and it would take backbone to resolve those problems, none of which Keith Blockinger had or allowed any other department to have. His answer to every situation was "fuck 'em we ain't doing it" "falsify the paperwork, do what you have to do but we ain't doing it." "Period!" and you went along or you didn't work there. It was that simple.

On the defective product we were shipping Keith Blockinger put alot of pressure on the whole quality department on shipping parts. First, we were short of people. He never would give us enough people and the people we did have came under direct pressure by Keith Blockinger everyday.

Keith Blockinger would pace the floor, look over their shoulders, make comments like "that's OK, that's OK, those will be OK." These are parts that had critical areas. They had sealing surfaces.

We knew that we couldn't ship gross defects and yet he would use his position of power and put direct pressure on us to do that. Many times he would just flat out tell us "ship it, we're going to ship it."

Me being the supervisor and having the position I had, I would sometimes argue with him or, you know, try to tell him "Keith, these are out of spec. They don't meet the customer standards. We can't ship those." "Keith we're going to hear about it." "Keith they are not functional." Delphi and AMP were the big ones I would always say "You know they aren't going to accept those. You know Delphi and AMP are going to send those back." His comment was "ship it."

My title was senior quality technician. My role as senior quality technician was to have the authority to make calls out on the floor as to what we ship and

what we won't ship in the inspection and for the quality department and meeting the customers standards but it got to the point where I couldn't make those calls anymore. Keith Blockinger was making those calls for me. The bad thing about this was that my initials or the auditor's initials that worked for me went on the boxes. We signed off on the paperwork. We showed total responsibility for what was shipped but we really didn't have that responsibility anymore. We were over ridden on alot of the calls we were making but yet it was our names going on the paperwork.

We were being told to ship product that didn't meet customer standards but yet we were signing off on that and we were told by Keith Blockinger to ship this product. This product wasn't just cosmetic blemishes in nature. These were gross defects in critical areas such as the sealing rib area. The sealing area of the parts were to be completely defect free. These are basic automotive industry standards per customer blueprints and anyone in the automotive rubber precision seal business, a rookie in that business, would know that these parts were completely unacceptable and non-functional. Any customer assembling these defective seals in their connection assemblies would experience complete seal system failures. Yet these were the type of defectives we were forced to ship on a continual basis.

Inspectors were trained by the quality department on what the customer standards were and in the process of their sorting, it would get to the point where parts were bad and we were throwing out alot of scrap. If it looked like the parts weren't going to be shipped because of the amount of scrap, then Keith Blockinger would start putting pressure on me to go in there and see what they were doing and get those parts shipped. He would want me to go through their scrap. He would want me to lower the standards in order to get the product out the door. When I did not run and immediately proceed to this because the parts were so bad, I was still in the process of checking things out but it was not fast enough for Keith Blockinger, he would go to Lorraine Cerimele's office and get her to come out and tell me to ship those parts. Sometimes these parts were inspected 6, 7, 8 times. We still couldn't get all the defects out but we weren't allowed to scrap the parts.

We were told to work through them and get them out. When your having to inspect a box of parts 6, 7, 8 times you're not going to pull all the defects out. You're going to ship defective parts. Every company, regardless of their line of business, or their commodity are going to ship a certain amount of

defective unknowingly. We all do. There's no such thing as zero defects. But the things that were happening on a daily basis at Lexington everyday, sometimes several times a day, was Keith Blockinger demanding the shipment of product that was knowingly gross defective, non-functional product and asking his employees to ship that product and release that defective product with their name attached to that product. Not his name, their name or my name.

We would be running defective parts as high as 80% defective and he, Keith Blockinger, wouldn't allow us to shut those presses down to correct the problem. Instead Keith Blockinger would force us to ship these parts and the customer would sometimes catch these defects. They would reject the product, send it back and then of course, it was the quality department's fault. The quality department was blamed because we released them and that was our name on that product. Keith Blockinger would then rant and rave "why didn't the quality department find those defects." We found them, but Keith had them shipped.

We always had alot of boxes sitting in the inspection room because they were rejected off of the floor. Once they were rejected off the floor they got sent into the inspection room for 100% inspection. We would have so many boxes sitting in the inspection room that when we had a customer visit, Delphi and AMP in particular, we would have to take these boxes out of the inspection room, hide them in a truck that was sitting out in the parking lot and keep them in there during the customer visit. Whether the customer visit was one day, two days, three days the boxes would sit in the truck until the customers were gone out of the facility and then they would bring that product back into the plant.

During a QS9000 audit and a customer audit Lexington actually rented big truck trailers. At one time we had five trailers. They were loaded to capacity with rejected parts that Keith Blockinger planned on shipping but didn't want the customers or the auditors to see them.

He rented five trailers, loaded them up and parked them behind the building across the street. We ran out of capacity on those five trailers, we then loaded up Lexington's personal box truck and shipped them to our warehouse on the West Side of Warren until the customer audit and QS9000 audit were completed. Once they were completed the defective product was brought back into the plant and shipped to the customer.

I want to say too, we had an inspection department to do 100% inspection. Time, after time, after time the quality department and myself as an individual, tried to convince Keith that he had a problem in the inspection room with the

parts not being looked at. These inspectors would talk and not look at the parts while they were flipping the parts into the box. The boxes that were going to be shipped to the customer. I said, these inspectors were there to do 100% inspection. They would roll the parts, the parts would go into the box and their head and eyes would be everywhere else while the parts would be rolling into the box. Then the quality department from there would do a final audit but then that goes back to the pressure that was being put on the quality department to ship those parts out and not spend too much time in a box to sort.

The reason they were doing this is because Keith Blockinger treated the inspection department as a production department. They were to inspect parts very quickly and get them out the door as you would expect a production department to do. On many occasions he would come into my office or Lorraine's office complaining about how long it would take an inspector to sort through a box and "time is money." Those parts have to get out today. Get in there and get them moving. They shouldn't take anymore than 10 or 15 minutes to go through that box." This would be a box of cable seals that had 60,000 pieces in it. So here again we have hired a group of people to perform a very specific task and that task was to remove the defective, every piece of defective, out of a box of product that was and is their function, period! And once again you have a group of people that were forced to deviate from their job function because they were not allotted the time necessary to perform that function because the bottom line is; whether they spent 10 minutes on that box or they spent 10 hours on that box, the box was going to be shipped. That was the bottom line. The box was going to be shipped. Keith Blockinger just wanted the box up at the auditor's station and into shipping. There were many, many different part numbers spanning across various customer lines; Delphi, AMP, Elcom, all of the customers we shipped to received grossly defective product. Product that was so grossly defective that it rendered the product non-functional. This occurred on a daily basis.

There were many times that Lorraine and I would discuss, after we were forced to ship product, we would talk about how we would just keep our finger's crossed hoping the customer would find it and reject it so that it would not be assembled in their plant. That's how bad some of the product was that we were forced to ship. We felt very guilty about it. We felt very bad about that because you almost feel like your undermining your own company when your sitting there hoping that you get rejected by your customer because that's one of the

worst things that could happen in the automotive industry. But there were many, many occasions where we did that because the product was just that bad. Nothing was as frightening as when we were forced to ship AMP product that were ABS seals or were part of the anti-lock brake system. We produced several ABS seals for AMP. I believe it's 5 or 6 and they all have problems associated with them. They all ran poorly in the plant, they run at a high defective rate and they were gross defects.

The defective ran in the critical areas to the seal and there are many occasions where we sat in meetings with AMP and AMP was very, very specific about their acceptance criteria, what you were allowed to ship and what you were not allowed to ship and we were forced by Keith Blockinger to ship against that criteria on a daily basis. AMP reiterated to us on many, many occasions the seriousness of these seals; they go into an anti-lock brake system. The seals carried a safety critical concern for AMP and that's why their standards were very, very fussy and they did tell us on several occasions that if we did not meet the criteria and we did not meet those standards the brakes could possibly fail. Yet everyday we shipped ABS seals out the door that did not meet AMP's specified criteria at Blockinger's insistence.

Many of these parts, that were the ABS seals, according to AMP standards were not allowed to be tumbled because we ran flash all the time. Keith Blockinger refused to get the tools corrected to eliminate the flash and we were forced to tumble these parts per Keith Blockinger.

When you run waste less/flashless tooling as Lexington does you have a high degree of preventative maintenance on your tools. Lexington does not perform preventative maintenance on their tools and they allow the tools to deteriorate. When the tool deteriorates, it wears at the parting lines and when that happens a condition called "Flash" ends up on the parts. "Flash" is excess rubber material on the part that forms around the defined lines of the actual body of the part, sticking up varying heights. You can have vertical and you can have horizontal flash. Those are undesirable conditions and are conditions that are not acceptable on most parts. Certainly it is not a condition that is acceptable on the AMP ABS seals.

Therefore when you have that kind of flash, the flash is not acceptable so you must tumble. The tumbling operation is where you put a large group of parts into a machine that tumbles and you put a large quantity of these parts in this machine. Liquid nitrogen is shot in for a predetermined amount of time

until the parts become frozen. Then you turn the machine on, it tumbles. The parts in their frozen state bang against each other and what is suppose to happen in that banging process is to remove just the flash. It is not suppose to harm the actual body of the part.

It sounds wonderful in theory but it doesn't work that well because what ends up happening, is the tumbling process creates other types of serious non-functional defects AMP knows this which is why AMP was absolutely adamant in their insistence that Lexington not tumble ABS seals because just by nature of the tumbling process it causes its own type of distinct defects and those defects that are created are cuts, splits, slits and chips. No section of the part is free from these type of defects, so that means your critical sealing surfaces are being cut, split, slit, chipped and cracked just by the nature of the tumbling process. AMP has been in the automotive business long enough to know that tumbling causes those type of defects and that's why they refused to allow us to tumble. Yet Keith Blockinger would not fix the tools and do what was necessary to spend the money or take the time to do what was necessary to bring the wasteless, flashless tools back into a state of flashlessness. When asked "what are we suppose to do now AMP is not going to accept parts with flash" the answer was "ship those parts", we shipped those parts, we got rejected. We got rejected for flash and all the parts came back. When asked Keith Blockinger "what are we going to do now. We shipped the flash, they rejected it. Parts coming off the press are still full of flash and we're not allowed to tumble." Keith Blockinger's response "fuck them." Tumble those parts and ship them." As of the day I left in January, 2000 they were still tumbling AMP parts and occasionally we would get caught and get rejected for cuts and splits. AMP would come back to us "I know your tumbling, I told you not to tumble, don't you ever tumble" "OK we won't, we won't ever tumble." Right back into the tumbler the parts went, at Keith's direction saying "I'm not fixing the tool." They don't like the flash so you'll tumble it off. Period!" per Keith Blockinger.

Some of the other problems we had with the AMP seals, one in particular was 7769109 AMP Chrysler 21 position seal, we ran trapped air, scorched, plugged holes, knitlines, tears, under cure, non-fills, wavy ribs, high and deep sprues, stringer flash, no oil, cuts and slits. The no oil and cuts and slits were defective created by the tumbling process. Those are parts that we were forced to ship.

Another problem we had with AMP open-holers were the under size wall thickness. That was a dimensional problem with those parts. The wall



thicknesses did not meet the spec according to the blue prints but we were forced to ship these parts, per Keith Blockinger. Keith was aware of it. Those parts were measured on a daily basis. The wall was measured daily because it was such a critical, critical item to AMP because what it causes is a thin wall condition. On one side of the seal the wall is fat and the other side is thin because the inserts have worn and not only was it a dimensional problem but it was so bad you could visually see it. At any rate, it was so critical we put a procedure in place to measure that condition daily. Keith still was not going to fix the tool to correct this problem. We were required to run them and ship them.

Some of the other parts we were forced to ship was WP909 Delphi. These had chips on the ribs. The ribs were the critical part of this part. There were chips on the ribs, knitlines, and warping. They were dimensionally out of spec. They had to go through a chlorination process that was required by the customer. Sometimes they wouldn't get chlorinated. Other times they might get a partial chlorination but we were still expected to ship these partial chlorination parts.

The rest of these parts I'm going to talk about are Delphi, and I want to say here that Delphi was 66% of our business at that time. The 12089679's we would run undercure, torn ribs, plugged holes, missing stems, trapped air. The 12048087's both of these were cable seals, again the same thing as the 679's, undercure, torn ribs, plugged holes, missing stems, trapped air. A solid hole or 12078089 again Delphi, plugged holes, 12040750 and 12040756 Delphi trapped air, it was a big problem with these parts. 15300020's, 12065663's, 12065227's, 15300023's, 12059201's, all these were open holers running trapped air, knitlines, vertical flash. Allot of pressure existed to ship those out and no correction to the tools, especially for the vertical flash that was a tool problem and nothing was done to correct the problem.

12040972's was a solid holer. This part ran knitlines but this part was also dimensionally under spec. Keith was aware of this problem. We went in and out of it with this part all the time but we were required to ship it. We were told to "ship it." Nothing was done to correct the problem.

The above list of part numbers is only meant to be examples. There were many, many more. It is certainly, not an all inclusive list but rather a compilation of some examples of types of products we were forced to ship on a daily basis by Keith Blockinger.

One of the teams I was involved in was cure time reduction. This is where they reduce the cure time that the part was required to be molded under.

They reduced the cure time in most cases from 4 min. down to 90 sec. Some of the internal spec numbers that they did this to was the WP842's, WP679's, WP087's, and the AMP ABS seals, just to name a few.

On this team we were required to evaluate the finished product after the cure time reduction of the process and document the findings and make a decision on whether to reject that cure time or accept that cure time. Well this team was useless. Really! I mean we had no authority. We did just what we were suppose to. We evaluated the finished product by dimensions, visual inspections. The team got together and discussed their findings on these parts and whether we should accept that cure time or reject the cure time and when we had to reject the cure time we were overridden. We weren't allowed to reject it.

There was alot of pressure put on everybody on this cure time reduction. This was Keith's "baby" so to speak. I mean Keith was going to have this cure time reduction no matter what. Nobody was to interfere with it, nobody was to stop it or it was obvious that your jobs were in jeopardy. I mean you weren't even allowed to talk against it and if you did try to talk against it you were shut up very quickly by anybody in management because this was going to work and nobody was going to stop it.

After being forced to run the cure time reduction program across many, many tools eventually Delphi caught us. They caught us illegally performing major process changes without their knowledge. We were cutting the cure time way down from 4 min. to 90 sec. and on some tools 80 sec. and 60 sec. Delphi was so absolutely livid they shut the cure time reduction tools down and absolutely prevented us from running cure time reduction. It had to stop. In the meantime Delphi representatives went back to their Company and had a big pow-wow about what they were going to do about Lexington. Keith Blockinger was extremely panicked. He was beside himself. He knew he had been caught red-handed. He knew how extremely serious the situation was.

Delphi called that they were coming back into our plant and they wanted to see documents. They wanted to see all the documents regarding cure time reduction. Keith had a meeting of his own and he ordered engineers to get rid of all their official cure time reduction documents and to falsify new ones. He ordered the quality department to purge all of their official cure time reduction documents and to falsify new ones and he ordered production supervisors to do the same. The entire plant was ordered to purge all their cure time reduction

documents and to lie to the customer when they came in and to make phony, falsified, fudged documents from supposedly the beginning of the cure time reduction program to present. So they had to falsify many months worth of documents and sit in a meeting and flat out lie to the customer.

I want to talk about Lorraine Cerimele and Keith Blockinger, his interaction with her, her interaction with him. Lorraine was a very strong quality manager. When I say strong I mean she defended the customer, the customers procedures and requirements and defended the systems. Keith didn't like that. It was obvious Keith didn't like that. He was intimidated by that. It interfered with what he was trying to do. Keith was all numbers, so a strong quality manager was a big thorn in his side and over the years he would bad mouth her.

It was obvious he had no respect for her. He didn't like the authority she had, that is, the quality authority. She had the control of quality and eventually, well it even started earlier, she was always the one he would put on the spot with the customers. She was the one who always had to deal with the customers. Keith would bow out of the meetings or Keith would not even be there for the meetings. We'd have customer audits and Keith would conveniently be out of town. Lorraine was always the one that was left to deal with the customers for whatever reason they were in there for.

Then came AMP, AMP was a customer that was very demanding very hard to deal with. They required alot of things that Keith just out right refused to do but he never said that to the customer. He use to say that to Lorraine all the time and I would overhear this. Anytime AMP came in Lorraine was the one that had to deal with them. Anytime they called on the phone Lorraine was the one that had to deal with them. Anytime they wanted anything from us Lorraine was the one that had to come up with it, however way she had to come up with it.

But I remember one day in particular I was sitting in her office and AMP was due to come in for a big meeting. I believe it was going to be a three day audit meeting which was very, very shortly before Lorraine was fired. This meeting took place before she was fired. I was sitting in her office and Lorraine proceeded to talk to Keith about this meeting and about their demands and Lorraine always kept him informed on AMP. Every step of the way she kept him informed of AMP and I heard that and saw that. If they'd call he would come into her office to find out about the phone call or she'd go to his office and tell

him about the phone call. If they came in it would be the same thing. She always kept him informed on what they wanted. Well Keith felt they were being very ridiculous and this particular time when I was sitting in her office he said "f\*\*\* them" he said "we can't do that, we aren't going to do that, you deal with it." So, when they came in for this three day meeting then Lorraine was the one that had to deal with it. Lorraine sat in on this meeting with them for three days and I know there was a lot of pressure. There were a lot of demands coming down. At the beginning of the three day meeting with AMP, as soon as they got there, the head of purchasing for AMP was part of the team that came along and he went into Keith's office and they had a pow-wow at the beginning and everybody kind of noticed that things were a little bit funny at that point but AMP wasn't talking and neither was Keith. During the three day meeting with the usual pressures and stresses and demands of AMP, when it ended the head of purchasing for AMP was sequestered once again with Keith for approximately an hour before AMP left. Everyone knew it was a little bit strange, everyone knew something was going on. Keith was acting very funny and he couldn't look at Lorraine and was walking around with his head down. That is usually a big danger sign. He could not look at anybody. It was typical behavior for Keith when there was something very dirty that he was about to do. The next day Lorraine was called into his office and she was fired.

I feel Lorraine was fired because she was a strong quality manager. She got in the way of what Keith was trying to do with that Company. I think Keith wanted control of the quality department. He didn't want the quality department getting in the way. Lorraine was his scapegoat for AMP. She would stand up to Keith, she would put her foot down when it was important and it was going to hurt the customer. Lorraine put her foot down as much as she possibly could and keep her job at the same time. Lorraine was not hired to lie and falsify records, none of us were, but that seemed to be all that Keith wanted us to do. Lorraine would try to stand up for the customer, and at times, to the extent that she could lose her job so therefore she was a huge headache to Keith.

Another reason is AMP. Regarding AMP, Lorraine was nothing more than Keith's scapegoat doing his bidding with AMP without him having to get his hands dirty or putting his name or reputation to anything. So he would send Lorraine in with her walking orders. If things would have worked out wonderful with AMP, Keith would have taken the credit, cause he was very

good at that, and if things supposedly fell apart, well Lorraine was to blame. So either way it was a nice tied up neat little package for Keith Blockinger, as usual.

After Lorraine left they brought in Gloria Knight to take her place as quality manager. She was the perfect one in Keith's eyes because she was somebody he could run and that's exactly what he did. He ran all over her. Keith had total control of the quality department. Keith called all the shots where the quality department was concerned and how they were going to proceed. One thing that happened right after Gloria got there was that Gloria spent alot of time getting every procedure Lorraine had put in place out of there. She didn't want anything left that was done by Lorraine.

Things really started to go down hill from that point. There were some really good procedures in place. For one, operators were responsible for their quality which was a real big successful, customer protection procedure. This procedure was discontinued, operators no longer had responsibility for the quality of their parts. In fact nobody did except the quality department which was trying to ship good parts.

When I say things went down hill, the inspection room filled up real quick with defective parts. Quality was expected to clean up the mess. The product acceptance rate dropped considerably. When Lorraine left the acceptance was 95-96%, it later went down to 60 some percent. We had customer complaints galore, and when I say galore I mean when Lorraine was there we had maybe 8 or 10 a year. We had, I believe it was the end of one month in four or six weeks we had 30 some customer complaints. We were just getting call, after call, after call. PR&R from Delphi, increased dramatically. Then we reached a point where we couldn't even meet shipments, so then we had delivery problems. So the whole place was falling apart. You had operators that had no responsibility, they didn't care what they ran anymore. You had the inspection room piled up where you just couldn't keep up with it. In fact not only could you not keep up with it, you couldn't find room to put anymore boxes. You had the acceptance rate drop and then we couldn't meet delivery and we had customer complaints like crazy.

As a result of Lorraine leaving and how every thing started to fall to pieces, my life was hell at Lexington. Keith was definitely running the new quality manager. She was trying to jump through hoops for him. She was making demands on myself and our department that were impossible to reach. The quality going out the door was so bad and this was a reflection on me because I was overseeing the quality in the factory and this all lead up to why I

quit. There was way too much pressure. The company had fallen so far and there was so much deceiving going on where the customer was concerned, that I just couldn't deal with it anymore.

At this point, I felt at the time when I quit there was no quality department because there was nobody in that plant that was protecting the customer anymore.

  
Deborah Roley

STATE OF OHIO                    )  
  ) ss.  
TRUMBULL COUNTY                )

Before me, a notary public this 25th day of July, 2000 personally appeared Deborah Roley who on her oath stated that she did sign the aforesaid affidavit and that the statements therein are true as she verily believes.



CHRISTINA PARRISH, Notary Public  
State of Ohio  
My Commission Expires 8/10/2006

  
NOTARY PUBLIC